

DRAFT without prejudice for the reason set forth in connection with
the court ruling on Dkt. 150. Michael C. Powers 4/10/14

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

C.A. # 3:11-cv-30271-MAP

ALBERTO L. GONZALEZ,)
Plaintiff,)
)
v.)
)
TIMOTHY V. DOOLING, JULIE PEASE,)
JEFFREY STONE, JOHN TALBOT,)
GARY LUCERO, STACY BOOK)
MICHELLE GOLDMAN, HEATHER HALL)
and INA HOWARD-HOGAN,)
)
Defendants.)

**DEFENDANT HEATHER E. HALL'S MOTION TO COMPEL
THE PRODUCTION OF DOCUMENTS FROM
THE SEX OFFENDER REGISTRY BOARD, A NON-PARTY**

Pursuant to Fed. R. Civ. P. 45(c)(2)(B)(i), and in compliance with Local Rule 7.1 and Local Rule 37.1, Heather E. Hall, a defendant in the above captioned matter, hereby moves for an Order of this court compelling the Sex Offender Registry Board of the Commonwealth of Massachusetts (SORB) to comply with a subpoena *duces tecum* by providing the documents requested through a lawfully issued subpoena (Exhibit A).

In support the documents sought through the subpoena *duces tecum* fall within the scope of Fed. R. Civ. P. 26 in that they are relevant and relate to the claims of the plaintiff's claim and the defenses of the defendant. Furthermore, the information sought is relevant to the subject matter involved in the action and Ms. Hall's request is supported by good cause.

Ms. Hall further relies upon the memorandum of law filed in support of her motion.

WHEREFORE, the defendant, Heather E. Hall, respectfully requests this honorable court to issue an order compelling the SORB to comply with the subpoena *duces tecum* at issue.